

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

MODEL ME KIDS, LLC,

Plaintiff,

v.

MODEL-ME-KIDS, INC.,

Defendant.

Case No. 1:22-cv-23871-JEM

**DECLARATION OF JAMES SLATER IN SUPPORT OF
PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT**

I, James Slater, declare and state as follows:

1. I am over 18 years of age and I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiff's Request for Clerk's Entry of Default. If called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am an attorney duly licensed to practice before this Court and I am counsel of record for Plaintiff Model Me Kids, LLC.

3. On November 28, 2022, Plaintiff filed its Complaint (Dkt. 1) against Defendant Model-Me-Kids, Inc.

4. On December 8, 2022, Defendant was served with a copy of the Summons and Complaint in this case. (Dkt. 6). Defendant's response to the Complaint was due on or before December 29, 2022.

5. On December 21, 2022, after speaking with Shushona Cooper, principal for Defendant, on the telephone, I confirmed in writing via email that Plaintiff would agree to extend Defendant's deadline to respond to the Complaint through January 20, 2023.

6. Plaintiff has not granted any further extensions to Defendant to respond to the Complaint.

7. On January 20, 2023, Ms. Cooper filed a motion for extension of time on behalf of Defendant.

8. On January 23, 2023, I reviewed the Florida Bar website and this Court's admission status lookup page, and Ms. Cooper is not listed on either site as an attorney, or someone admitted to practice before this Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of January 2023 at Tallahassee, Florida.

James M. Slater
James M. Slater